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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE VALEANT PHARMACEUTICALS
INTERNATIONAL, INC. SECURITIES
LITIGATION

Master File No. 15-cv-07658-MAS-LHG

T. ROWE PRICE GROWTH STOCK FUND,
INC., et al.

Civil Case No. 16-cv-05034-MAS-LHG

Plaintiffs,

v.

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC., J. MICHAEL
PEARSON, HOWARD B. SCHILLER,
ROBERT L. ROSIELLO, DEBORAH JORN,
ARI S. KELLEN, and TANYA CARRO,

Defendants,

EQUITY TRUSTEES LIMITED AS
RESPONSIBLE ENTITY FOR T. ROWE
PRICE GLOBAL EQUITY FUND, et al.,

Civil Case No. 16-cv-06127-MAS-LHG

Plaintiffs,

v.

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC., J. MICHAEL

PEARSON, HOWARD B. SCHILLER,
ROBERT L. ROSIELLO, DEBORAH JORN,
ARI S. KELLEN, and TANYA CARRO,

Defendants,

PRINCIPAL FUNDS, et al.,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC., J. MICHAEL
PEARSON, HOWARD B. SCHILLER,
ROBERT L. ROSIELLO, DEBORAH JORN,
ARI S. KELLEN, and TANYA CARRO,

Defendants,

Civil Case No. 16-cv-06128-MAS-LHG

BLOOMBERGSEN PARTNERS FUND, LP,
et al.,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC., J. MICHAEL
PEARSON, HOWARD B. SCHILLER,
ROBERT L. ROSIELLO, DEBORAH JORN,
ARI S. KELLEN, and TANYA CARRO,

Defendants,

Civil Case No. 16-cv-07212-MAS-LHG

PENTWATER EQUITY OPPORTUNITIES
MASTER FUND LTD., ET AL.,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC., J. MICHAEL

Civil Case No. 17-cv-07552-MAS-LHG

PEARSON, HOWARD B. SCHILLER,
ROBERT L. ROSIELLO, DEBORAH JORN,
ARI S. KELLEN, and TANYA CARRO,

Defendants.

**INDIVIDUAL ACTION PLAINTIFFS' NOTICE OF JOINDER TO
CLASS PLAINTIFFS' MEMORANDUM OF LAW IN OPPOSITION TO STAY**

Pursuant to this Court's Order to Show Cause (ECF No. 273), Plaintiffs in the five above-captioned individual actions ("Individual Action Plaintiffs"), hereby respectfully join in the arguments set forth in Plaintiffs' Memorandum of Law in Opposition to Stay, filed in the related securities class action case, *In re Valeant Pharmaceuticals International, Inc. Securities Litigation*, Master File No. 15-cv-07658-MAS-LHG (ECF No. 279).

For the reasons set forth in the stay opposition brief filed by the class plaintiffs, the Individual Action Plaintiffs respectfully submit that the Court should not stay the above-captioned civil proceedings. A stay of document discovery is particularly unwarranted. Staying document discovery would neither serve the interests of justice, nor facilitate the just and speedy determination of these civil actions. *See* Fed. R. Civ. P. 1. Further, allowing document production to proceed would cause no prejudice to the parties in these actions or to non-parties Gary Tanner and Andrew Davenport in their criminal proceedings.

Dated: November 3, 2017

Respectfully submitted,

**CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO, P.C.**

**BERNSTEIN LITOWITZ BERGER
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